

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

CHAMBER OF COMMERCE OF THE
UNITED STATES OF AMERICA and
AMERICAN PETROLEUM INSTITUTE,

Plaintiffs,

and

WEST VIRGINIA, et al.,

Proposed Intervenor-Plaintiffs,

v.

JULIE MOORE, in her official capacity as the
Secretary of the Vermont Agency of Natural
Resources, and JANE LAZORCHAK, in her
official capacity as the Director of the Vermont
Agency of Natural Resources Climate Action
Office,

Defendants.

CASE NO. 2:24-cv-1513-mkl

STIPULATED MOTION TO INTERVENE

Plaintiffs State of West Virginia, State of Alabama, State of Alaska, State of Arkansas,
State of Florida, State of Georgia, State of Idaho, State of Indiana, State of Iowa, State of Kansas,
Commonwealth of Kentucky, State of Louisiana, State of Missouri, State of Montana, State of
Nebraska, State of North Dakota, State of Ohio, State of Oklahoma, State of South Carolina,
State of South Dakota, State of Tennessee, State of Texas, State of Utah, and State of Wyoming
hereby move to intervene in the above-captioned proceeding pursuant to Federal Rule of Civil
Procedure 24. Pursuant to Local Rule 7(a)(7), the undersigned counsel have consulted with the
parties to seek agreement to the requested relief. Counsel for Defendants represented that
Defendants do not oppose intervention. Counsel for Plaintiffs represented that Plaintiffs do not

oppose intervention. A Memorandum of Law in support of this motion and a Proposed Complaint are attached hereto.

Dated: May 1, 2025

Respectfully submitted,

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**motion for pro hac vice admission
forthcoming*